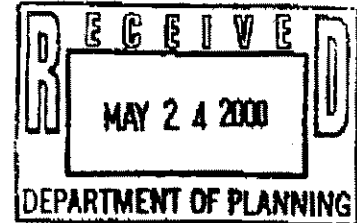


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May 10, 2000

Ms. Julie Pastor  
Director of Planning  
Loudoun County, Virginia  
1 Harrison Street, S.E.  
P.O. Box 7000  
Leesburg, VA 20177-7000

**RE: Comments on Loudoun County Comprehensive Plan Review and Update Reports**

Dear Julie:

As requested, Barry Carpenter and I have reviewed a number of reports prepared by your staff as part of Loudoun's Comprehensive Plan Review and Update. We began with the Comprehensive Plan Review and Update Framework Report (March 22, 2000) to provide us the background we needed to read and digest the following reports:

- General Plan Rural Character Options (April 28, 2000)
- General Plan Environmental Policy Options (April 20, 2000)
- Green Infrastructure, Stream Corridor and Water Resources Report (April 20, 2000)
- Suburban Policy Area - Community Identification Report (April 28, 2000)

Our comments on all the reports follow. Please keep in mind that while we can bring an outsider's objectivity that may be helpful, we may be off base in some of our comments because we have not been involved in all the discussions and deliberations. Also please realize that we offer these comments in an effort to assist the County in its thinking and not as criticism of your obviously diligent efforts to address some very difficult issues.

**Comprehensive Plan Review and Update Framework Report (March 22, 2000)**

This report was very helpful in providing the history of growth and planning in Loudoun and in describing the breadth and depth of the current effort to change growth trends. Because this document is general and provides the "big picture," our comments on this will be more "big picture" in nature.



Definition of Smart Growth (p. 13): Do you think that Loudoun citizens really understand what "smart growth" is? We agree that defining "smart growth" is important, but while the County is still dwelling in the realm of words without plans and pictures, we are not sure that people really understand. The Planning Commission's Smart Growth Principles are very good, but do they really convey the implications of Smart Growth? If you look at them closely, they are very much like many standard Comprehensive Plan goals. The major difference is that the environmental goal comes first in the list. Of course, coming first, the environmental goal sets the tone for the rest of the principles, which is very important. What concerns us about citizens' understanding of smart growth are references later in this report and in other reports to citizen concerns about:

- Not wanting to live next to or have any connections to new developments of smaller lots
- Road connections causing "cut-through traffic"
- Loss of open space to infill development in the eastern growth area
- Desiring low density transitions between the suburban growth area and the rural area
- Thinking that large-lot development in the rural area will preserve rural character

Many citizens have an idealized image of what the suburbs should be like and do not understand that the incremental addition of more and more large lots on cul-de-sacs and big-box retail stores is what causes loss of community character and traffic nightmares. An article in the April 30, 2000, *Washington Post Magazine*, "How does construction a site become a community?," illustrates the problem well. We have enclosed a copy. Notice the statements made on page 62. We would guess that many new suburban arrivals in Loudoun would agree with most of what the author says.

All this is nothing new to you, but of course the big question is how to avoid problems when you start proposing detailed plans and strategies. Would it make sense at all to try and slow down and have a number of workshops around the County where you attempt to define smart growth in photos, sketches and general concept plans? Should you develop a consistent Smart Growth philosophy and approach to decision-making? Should you and the Planning Commission fly out to Portland to see how it really works? Maybe you have already done some things like this.

To be practical about Loudoun's current smart growth effort, perhaps it may not result in a true understanding of smart growth. Perhaps, what you can achieve is an agreement about Loudoun's version of smart growth and a philosophy to go with it to help in decision-making.

Rural Residential Issues (page 13): This is obviously one of the most important and difficult issues that Loudoun will address. We are sure that there are more detailed policy documents to come. Reducing densities appears to us to be essential with either mandatory or very strong incentives to cluster. Our experience is that if you permit large lot development, 10 acre minimum or even 50 acre minimum, there will be a market for it. As you know, this kind of development has the potential to convert large amounts of agricultural land to residential estates with a loss of rural

character and agricultural production. When we worked several years ago on development options for a 4,000-acre estate in Fauquier, the county allowed 50-acre lots to be subdivided by right with very minimal review. After looking at all the options, the client's real estate market analysts determined that the 50-acre lot option provided the best, most risk-free rate of return at that time (1992). We offered a "rural village"-type option that would have preserved at least 85% open space, but because of the lengthy government review, infrastructure costs, and risk, this option was not chosen.

It appears that the county may consider sliding scale zoning. Our experience with this type of zoning in Fauquier is that it can result in very strange development patterns. It is based on land parcelization patterns at the time of adoption and unfortunately such patterns are often not logical nor desirable. The smaller parcels that receive the most density may not be in good locations with regard to access, environmental constraints, or other reasons. Large parcel owners are penalized for having kept their properties intact. Perhaps parcel size is not the best criterion to use in assigning density. A number of criteria might be used based on proximity to services, integrity of the area with regard to agricultural production, environmental constraints, etc.

With regard to rural villages and hamlets, these ordinances do need to be reviewed. We understand the points made by the Rural Task Force in *The 200,000 Acre Solution* that rural villages as now planned and developed might intensify demand for capital improvements in rural areas. We are concerned that they may end up looking just like suburban subdivisions, though isolated within open space. The answer may be an overall reduction in density so the rural villages are not so large, as well as some revised standards that limit lot size, etc.

We have more experience with rural hamlets and are ready and willing to critique our own plan for the Broad Run Village property. We think that if our plan were implemented, it would not maintain the rural character of this property. The eight hamlets are too spread out, leaving little land that could potentially be used for agriculture. The conservancy lots compound this problem. The hamlet lots are too large and would permit large suburban-style houses that are nothing like the historic houses of Loudoun's rural area. The curvilinear roads will look and feel like modern suburban roads. Rural hamlets are much better than standard A-3 subdivision, but Loudoun has the opportunity now to revise the rural hamlet ordinance to make it better at protecting rural character. Possible revisions could include reducing the maximum hamlet lot size and frontage requirement, eliminating conservancy lots, allowing more flexibility in size and spacing of the hamlets especially on large properties, and reducing gross densities. The flexibility of size and spacing would allow better use of conservation subdivision design principles. It would be interesting to test some ideas on the Broad Run Village Property.

Area / Community Plan Development - PND Buffers (page 17): Neighborhood edges can be defined in many different ways, not just through open space buffers. By providing such buffers, overall gross densities in eastern Loudoun could be lowered, pushing demand for housing out into

the rural area. Smart growth promotes sensitively designed infill, not buffers. A neighborhood identity program could use signage, road landscape treatments, and placement of focal landmarks to define the edges of neighborhoods.

Open Space (page 18): Well-located usable open space for recreation and civic activities is important in eastern Loudoun to make livable communities, but not as a method for reducing density.

Transition Areas (page 19): In our experience, density transition areas tend to blur edges and reduce the sense of place. No longer do you have town and country each with a strong identity. Fairfax County's entire comprehensive plan is based on density transitions, which has contributed to its lack of sense of place. What kind of place is the transition area? Can it have an identity if it is merely to serve as a buffer between two other places? A greenbelt transition has the benefit of perhaps reducing conflicts between agricultural operations and urban communities, but would not the county have to buy the greenbelt or at least obtain an open space easement?

Fiscal Impact (page 19-20): We are glad that you are looking at fiscal impact, particularly at the county's 1.6 du/ac threshold for paying the full capital facility cost for new dwelling units. Is this policy creating an incentive for large lot development?

#### **General Plan Rural Character Options (April 28, 2000)**

Proposed list of rural character features (page 5): We suggest the following be added or used to supplement to your list:

- House and building location (historically houses and villages were often located near a water source rather than on top of the hill)
- House size, style, materials (many of the new mansions are larger and constructed of different materials than Loudoun's historic rural homes)
- Farm building size and style
- Villages and hamlets that have very small lots and even some attached houses (We have samples of house designs for small lots in new traditional neighborhoods/villages.)
- Road widths, design (rural roads are often straight with irregular turns rather than curvilinear, have narrow widths, and require slower speeds)
- Brushy roadsides, minimal mowed lawn, less manicured vegetation

Could all the rural character elements be described in more detail with photos and sketches and developed into design guidelines?

Countywide Transportation Plan policies (page 5-6): As you know, road design greatly impacts rural character. If new subdivisions, hamlets, villages are to be accommodated, they will

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adversely affect rural character if VDOT road standards must be followed. CTP policy # 4.26 listed on page 14 is one of the most important policies dealing with this issue.

Option 3, rural lifestyle and social values (page 7): We wonder whether there can be an agreed-upon rural lifestyle and set of social values. Do these exist in Loudoun? Would it be better to work on developing a smart growth philosophy that supports rural character, urban character and other smart growth goals? Maybe we are misinterpreting Option 3. It seems to say that there is an existing rural lifestyle and set of values that supports rural character. This should be described and related to the rural character features. What we are suggesting is slightly different: a smart growth philosophy that helps people make good smart growth decisions - ones that preserve rural character among other things. This is a philosophy for the future, not a description of current values.

#### **General Plan Environmental Policy Options (April 20, 2000)**

Big Picture Comments on the Entire Document: The Environmental Policy Options presented are very ambitious and laudable and certainly support smart growth in many ways, but we would like to propose that you consider some variability in environmental standards depending on location. The Chesapeake Bay Foundation in its publication *A Better Way to Grow* points out that suburban sprawl has adversely affected environmental quality in the Chesapeake Bay Watershed. They recommend compact transit-oriented infill development instead. In order to accomplish this, it may be difficult to protect all the floodplains, streams and steep slopes you recommend for protection and still keep densities high enough to support transit, walking, bicycling, etc. In more urban areas, perhaps the standards might be varied to allow more development intensity.

This sounds like it is forsaking environmental values, but is it? Tom Schueler in his book, *Site Planning for Urban Stream Protection* (Metropolitan Washington Council of Governments and the Center for Watershed Protection, Washington, DC, 1995), presents research that shows that stream channel stability and biological diversity decline once watershed impervious surfaces exceed 10 - 12%. It does not take much urban development to reach this threshold. Many of eastern Loudoun's watersheds may have already reached this level of imperviousness and already have degraded streams. Would it be better to concentrate development in these watersheds than let it spill over into more pristine watersheds? Will enforcing the same environmental standards in all watersheds do this? Tom Schueler recommends watershed-based performance standards. We recommend the county consider this.

Stream Corridors, Options D and E (page 5): How will the county define intermittent streams? Will you use U.S.G.S. maps? Almost any swale could be considered an intermittent stream. Protecting all such streams may create real community design problems. For example, smart growth encourages road and trail connectivity. This may be difficult to achieve if intermittent stream crossings are severely limited.

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Chesapeake Bay Preservation Act (page 9): It would certainly make a positive environmental statement for Loudoun to adopt the provisions of the Chesapeake Bay Preservation Act (CBPA). We suggest that you can do better. The CBPA was adopted in a form that the State thought all coastal counties could abide by. These included very rural counties that did not even have a planning department and only minimal development controls. Some of the CBPA standards and approaches to environmental protection are rather simplistic. Perhaps the County could use CBPA as a base from which to start but modify it for the county's needs and capabilities.

Tree Preservation (page 11 - 13): Should you start out this section describing the value of Loudoun's forests for lumber and veneer, when this section really focuses on tree protection not harvesting? The first and second paragraphs of this section seem to conflict in intent.

If you implement Option B, what will prevent a landowner harvesting his trees and then applying for development permits? Maryland has had tree-save requirements for a long time. Perhaps, they have dealt with this problem.

Prime Agricultural Soils - Option B (page 16): We are not sure what Option B is proposing. At this point, it is a little vague.

Lighting (page 16-17): We are seeing a significant amount of retrofitting of gas stations and fast food restaurant parking lots with intensive lighting systems. As you state, your selected option will not address this problem.

#### **Green Infrastructure, Stream Corridor and Water Resources Report (April 20, 2000)**

Green Infrastructure - Resource Management Database (page 2): The delineation of wetlands for your GIS database will take a lot of effort. Since developers will have to do this for the Corps of Engineers and the Corps has lowered its threshold for such delineation, does the county need to do this?

Green Infrastructure - Conservation Design (page 2-3): The Resource Assessment Study for all development applications is a good idea.

Stream Corridors (page 6): Under policy P4., do you need to define what a buffer is? Is it undisturbed natural vegetation?

Stream Corridors (page 7): As stated earlier, a buffer along intermittent streams will likely make community design very difficult.

Surface and Groundwater Resources (page 14): Regarding the fourth major bullet, it will be difficult to design developments that closely approximate the pre-development hydrologic

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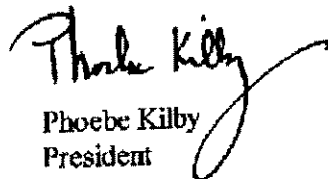
response of a watershed. Tom Schueler, who heads the Center for Watershed Protection (410) 461-8323), may be able to help you with this.


**Suburban Policy Area - Community Identification Report (April 28, 2000)**

We agree with your recommendation to propose Option C2 - Eight Community Model to the citizens and Planning Commission. Citizens should be able to identify better with smaller defined communities. The names of the communities could be more homey, friendly or inspiring. "South Dulles" does not say "community." Perhaps the county could work with citizens to develop better names and also a community identity program with signs, landscape treatments, landmarks, etc.

We think that you and your staff are doing a very good job of moving Loudoun toward smart growth and are excited to be involved in the effort. We hope that these initial comments on the policies developed to date are helpful. We are eager to discuss them with you at your convenience.

Sincerely,  
Strategic Land Planning, Inc.

  
Phoebe Kilby  
President

  
Barry Carpenter  
Vice President

